

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:

**WATSON GRINDING &  
MANUFACTURING CO.,**

Debtor.

**CASE NO. 20-30967**

(Chapter 11)

HORTENSA LIMA AND EDWARD  
FLORES,

Plaintiffs,

**V.**

ADVERSARY NO. \_\_\_\_\_

**WATSON GRINDING AND  
MANUFACTURING CO., WATSON  
VALVE SERVICES, INC., KMHJ  
MANAGEMENT COMPANY, LLC,  
KMHJ, LTD., WESTERN  
INTERNATIONAL GAS &  
CYLINDERS, INC., AND  
MATHESON TRI-GAS, INC.,**

## Defendants.

## NOTICE OF REMOVAL

Watson Grinding & Manufacturing Co. (the “Debtor”) files this Notice of Removal of the state court action styled *Hortensia Lima and Edward Flores v. Watson Grinding and Manufacturing Co., Watson Valve Services, Inc., KMHJ Management Company, LLC, KMHJ, Ltd., Western International Gas & Cylinders, Inc., and Matheson Tri-Gas, Inc.*, Cause No. 2020-37607, pending in the 270<sup>th</sup> Judicial District Court of Harris County, Texas (the “State Court Action”).

**I. Procedural Background and Nature of Suit**

1. On June 23, 2020, Hortensia Lima and Edward Flores (collectively, the “Plaintiffs”) filed an Original Petition and Jury Demand (the “Original Petition”) against Watson Grinding & Manufacturing Co., Watson Valve Services, Inc., KMHJ Management Company, LLC, KMHJ, Ltd., Western International Gas & Cylinders, Inc., and Matheson Tri-Gas, Inc. (collectively, the “Defendants”). In their Original Petition, the Plaintiffs assert claims of negligence, gross negligence and negligent trespass against the Defendants.

2. On February 6, 2020 (the “Petition Date”), the Debtor filed its Voluntary Petition under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), commencing the bankruptcy case captioned *In re Watson Grinding & Manufacturing Co.*, Case No. 20-30967, pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Chapter 11 Bankruptcy Case”).

**II. Basis for Removal**

3. This Notice of Removal is filed pursuant to 28 U.S.C. § 1452, Bankruptcy Rule 9027, and Local Bankruptcy Rules 9027-1, 9027-2, 9027-3, and the *General Order of Reference* entered by the District Court of this District on March 10, 2005.

4. The State Court Action was initiated after the commencement of the Chapter 11 Case. This Notice of Removal has been timely filed pursuant to Bankruptcy Rule 9027(a)(2). *In re R.E. Loans, LLC*, No. 11-35865, 2012 WL 3262767, at \*2 (Bankr. S.D. Tex. Aug. 8, 2012).

5. Venue in this Court is proper pursuant to 28 U.S.C. § 1409.

6. Cases subject to jurisdiction are removable under the authority of 28 U.S.C. § 1452(a) (“A party may remove any claim or cause of action...to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title”). The State Court Action, including all claims and causes of action asserted

therein, is a civil action other than a proceeding before the United States Tax Court. The State Court Action is not a civil action by a government unit to enforce such government unit's police or regulatory power.

7. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334(b) (federal district courts have "original jurisdiction of all civil proceedings...arising in or related to cases under title 11"). The State Court Action "arises in" or, alternatively, is "related to" a Title 11 case, *i.e.* the Debtor's Chapter 11 Bankruptcy Case. In this circuit, "related to" proceedings include any case whose outcome "could *conceivably* have any effect on the administration of the estate." *In re Wood*, 825 F.2d 90, 93 (5th Cir. 1987) (emphasis added); *In re Baudoin*, 981 F.2d 736, 740 (5th Cir. 1993).

8. The resolution of this State Court Action will have a direct impact on the bankruptcy estate of the Debtor. The State Court Action is related to the Debtor's Chapter 11 Bankruptcy Case because the outcome of State Court Action could conceivably change the Debtor's rights, liabilities, or options in a way that would have an effect upon the handling and administration of the bankruptcy estate.

9. Thus, the claims asserted in the State Court Action are claims that arise in or are otherwise related to the Debtor's Chapter 11 Case pursuant to 28 U.S.C. § 1334(b), and removal to this Court is proper pursuant to 28 U.S.C. § 1452(a).

### **III. Core or Non-Core Bankruptcy Jurisdiction**

10. This action involves the administration of the Debtor's estate and is a proceeding affecting the adjustment of the debtor-creditor relationship; it is, therefore, a core proceeding under 28 U.S.C. § 157(b)(2)(A)(B)(C) and (O). The claims and causes of action in the State Court Action have a clear and direct impact on the interests and property of the Debtor's estate under 11 U.S.C. § 541.

11. Upon removal of the State Court Action, the Debtor consents to the entry of final orders or judgment by the bankruptcy judge.

**IV. Parties and Notice**

12. Pursuant to 28 U.S.C. § 1452(a), Federal Bankruptcy Rule 9027(b), and Local Rule 9027-1, all adverse parties are being provided with a copy of this Notice of Removal and a copy of this Notice of Removal is being filed with the clerk of the 270<sup>th</sup> Judicial District Court of Harris County, Texas.

13. In accordance with Local Rule 9027-1(a), the names and addresses of the parties and counsel in the State Court Action, who have or will be served with the notice, are as follows:

Clark, Love & Hutson, PLLC  
Adam D. Peavy  
440 Louisiana Street, Suite 1700  
Houston, Texas 77002

**ATTORNEYS FOR PLAINTIFFS**

**V. Process and Pleadings**

14. Pursuant to Bankruptcy Rule 9027(a)(1) and Local Bankruptcy Rule 9027-1(b), true and correct copies of all process and pleadings filed in the State Court Action (as set forth in the attached Exhibit “A”) have been provided to this Court.

15. In the State Court Action, citations were issued on June 24, 2020, on all the Defendants. No return of citations has been filed.

16. In accordance with Bankruptcy Rule 9027(c), the Debtor will promptly file a notice of the filing of this Notice of Removal in the State Court Action.

WHEREFORE, the Debtor notifies the United States Bankruptcy Court for the Southern District of Texas, Houston Division, that the State Court Action is hereby removed in its entirety to this Court pursuant to 28 U.S.C. § 1452(a) and Bankruptcy Rule 9027.

Dated: June 26, 2020.

Respectfully submitted,

**JONES MURRAY & BEATTY, LLP**

By: /s/ Ruth Van Meter

Erin E. Jones

Texas Bar No. 24032478

Ruth Van Meter

Texas Bar No. 20661570

4119 Montrose Blvd, Suite 230

Houston, Texas 77006

Phone: 832-529-1999

Fax: 832-529-5513

[erin@jmbllp.com](mailto:erin@jmbllp.com)

[ruth@jmbllp.com](mailto:ruth@jmbllp.com)

**PROPOSED SPECIAL COUNSEL FOR JANET  
S. NORTHRUP, CHAPTER 11 TRUSTEE OF  
THE ESTATE OF WATSON GRINDING &  
MANUFACTURING CO.**

AND

**McCOY LEAVITT LASKEY LLC**

By: /s/ Michael I. Ramirez

Michael I. Ramirez

Texas Bar No. 24008604

20726 Stone Oak Parkway, Suite 116

San Antonio, TX 78258

Telephone (210) 446-2828

Fax (262) 522-7020

[mramirez@mlllaw.com](mailto:mramirez@mlllaw.com)

**COUNSEL FOR WATSON GRINDING &  
MANUFACTURING CO.**

**CERTIFICATE OF SERVICE**

I certify that on June 26, 2020, a true and correct copy of the foregoing Notice was served via ECF/PACER to all parties registered to receive such service and on June 27, 2020, via first class mail (without attachments) to the following:

Clark, Love & Hutson, PLLC  
Adam D. Peavey  
440 Louisiana Street, Suite 1700  
Houston, Texas 77002

**ATTORNEYS FOR PLAINTIFFS**

/s/ Ruth Van Meter  
Ruth Van Meter

**EXHIBIT A**

**2020-37607**

**COURT:** 270th

**FILED DATE:** 6/23/2020

**CASE TYPE:** Other Injury or Damage



**LIMA, HORTENSIA**

Attorney: PEAVY, ADAM DANIEL

**VS.**

**WATSON GRINDING AND MANUFACTURING CO**

**Docket Sheet Entries**

**Date**

**Comment**





with a level 3 discovery plan that is tailored to the particular circumstance of this case, in accordance with Rule 190 of the Texas Rule of Civil Procedure.

## **II.** **PARTIES**

2. Plaintiffs Hortensia Lima and Edward Flores are Texas residents who reside in Harris County.

3. Defendant Watson Grinding and Manufacturing Co. is a domestic company engaged in business in the State of Texas. Watson Grinding and Manufacturing Co. regularly conducts business in a systematic and continuous manner in Texas and may be served with by certified mail, return receipt requested, through its registered agent: John M. Watson, 4525 Gessner Road, Houston, Texas 77041.

4. Defendant Watson Valve Services, Inc. is a domestic for-profit corporation doing business in the State of Texas. Defendant's principal place of business is located in Harris County, Texas. Defendant may be served through its registered agent: John M. Watson, 4525 Gessner Road, Houston, Texas 77041.

5. Defendant KMHJ Management Company, LLC is a domestic limited liability company registered to do business in the State of Texas, whose managing member is a resident of Harris County, Texas. Defendant may be served through its registered agent, Kelly Lee Watson, at 1400 McKinney Street, Suite 1212, Houston, Texas 77010 or wherever it may be found.

6. Defendant KMHJ, LTD. Is a domestic limited partnership registered to do business in Texas whose general partner is a resident of Harris County, Texas. Defendant may be served through its registered agent, KMHJ Management Company, LLC, at 1400 McKinney Street, Suite 1212, Houston, Texas 77010 or wherever it may be found.

7. Defendant Western International Gas & Cylinders, Inc. is a domestic for-profit corporation incorporated under the laws of the State of Texas with its principal place of business in Houston, Harris County, Texas. Defendant may be served through its registered agent, Ms. Denise C. Haugen, at 7173 Highway 159 East, Bellville, Texas 77418 or wherever she may be found.

8. Defendant Matheson Tri-Gas, Inc., is a domestic for-profit corporation incorporated under the laws of the State of Texas and operating in Texas. Defendant may be served through its registered agent, CT Corporation Services, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

9. Plaintiffs specifically invoke the right to institute this suit against whatever entity was conducting business using the assumed or common name of Watson Grinding and Manufacturing Co. regarding the events described in this Petition. Plaintiffs invoke the right under Rule 28 of the Texas Rules of Civil Procedure to have the true name of this party substituted later upon the motion of any party or of the court.

### **III.** **JURISDICTION AND VENUE**

10. This court has subject matter jurisdiction of this cause of action because it involves an amount in controversy in excess of the minimum jurisdictional limits of this Court.

11. Venue is proper in Harris County under Tex. Civ. Prac. & Rem. Code § 15.002(a)(1), because all or a substantial all the events or omissions giving rise to this lawsuit occurred in Harris County. In addition, Plaintiffs' property is in Harris County, the loss and damages at issue occurred in Harris County, the Defendants' conduct that caused all of Plaintiffs' injuries occurred in Harris County, and the Defendants maintain its principal place of business in Harris County.

12. The damages sought are within the jurisdictional limits of this court. Plaintiffs currently seek monetary relief over \$1,000,000, including damages of any kind, penalties, costs, expenses, and pre- and post-judgment interest.

#### **IV. FACTUAL BACKGROUND**

13. In the early morning hours on January 24, 2020, the Plaintiffs were sleeping in their home on Stanford Court in Northwest Houston directly behind Watson's manufacturing facility located at 4525 Gessner Road, Houston, Texas 77041.

14. At some point around 4:30 a.m., a massive explosion occurred at the Watson facility, resulting in casualties and significant damage to the surrounding homes and businesses. The explosion was felt and heard for miles in every direction and left a debris field that stretched almost a half-mile from the explosion site. The gas that was allegedly involved in the explosion was propylene, a dangerous and hazardous fuel gas that is highly flammable.

15. Because Plaintiffs home was directly behind the explosion site, it took a direct hit from the explosion, causing significant damage. Almost all of Plaintiffs' windows shattered instantly and glass was strewn all over the beds, furniture and floor making the home dangerous and uninhabitable. Entire portions of the roof, ceiling, walls and fixtures were destroyed by the blast and the structural stability of Plaintiffs' home is permanently damaged.

16. Virtually every room in Plaintiffs' home was damaged by the blast and the falling debris from the walls and ceiling injured the Plaintiffs while they were sleeping in their beds. Both Plaintiffs feared for their lives and after the explosion, they were forced to seek emergency medical treatment for their injuries. They remain in shock and have been unable to work. In addition, both of Plaintiffs' vehicles parked outside were damaged by falling debris from the explosion.

17. All total, Plaintiffs have lost the use of their home and cars, they have lost almost all of their belongings and have suffered significant personal injuries, both physical and mental. These damages were all caused by the explosion at Defendants' manufacturing facility.

**V.**  
**CAUSES OF ACTION**

**NEGLIGENCE**

18. At all material times, Defendants were under a duty to exercise reasonable or ordinary care in the operation and management of their manufacturing facility. More specifically, Defendants were under a duty to exercise ordinary care, meaning that degree of care that would be used by a similar company under the same or similar circumstances, to refrain from negligent conduct that would cause explosions resulting in injuries to individuals in the area and damage to the surrounding property.

19. Defendants knew or should have known that the acts and omissions described in this petition could result in damage to surrounding property and the individuals living inside those homes.

20. Defendants failed to exercise reasonable or ordinary care in managing its facility and operations to ensure that the explosion did not occur, and thereby breaching its duties to the Plaintiffs.

21. Defendants failed to exercise reasonable and ordinary care when conducting its business and breached its duty to the Plaintiffs, including but not limited to one or more of the following ways:

- a. In failing to properly store, maintain, inspect, supervise or otherwise control the operation of its manufacturing facility;

- b. Failing to safely and properly contain and store dangerous materials, such that they are adequately protected from explosions;
- c. Failing to provide adequate equipment, competent personnel and training to its employees;
- d. Failing to create, promulgate, implement or enforce safety rules and guidelines pertaining to the safe operation of its facility;
- e. Failing to have adequate procedures or contingencies in place to protect the safety of the community in the event of an explosion;
- f. Failing to warn of known hazards;

22. Each of these acts and omissions, singularly or in combination, constitute negligence which was the proximate cause of the explosion and Plaintiffs' injuries.

23. At all-times material hereto, all the agents and employees for Defendants who were connected in any way with the explosion were acting within the course and scope of their employment or official duties and in furtherance of their employment. These agents and employees were acting in a managerial capacity or as vice-principals, and the acts committed by them were authorized, approved, and ratified by Defendants.

24. As a result of the explosion caused by Defendants, Plaintiffs suffered personal injuries, economic injuries and permanent damage to their property.

### **GROSS NEGLIGENCE**

25. Plaintiffs re-allege each and every aforementioned allegation. Plaintiffs will further show that the acts and/or omissions of the Defendants, when viewed objectively, involve an extreme degree of risk considering the probability and magnitude of the potential harm to others. Defendants had actual and/or constructive knowledge of the facts and circumstances leading up to

the explosion and knew that their failure to exercise reasonable care would cause significant losses to the citizens surrounding its building.

26. Defendants' actions and inactions were grossly negligent, reckless, willful and/or wanton. Defendants had actual subjective awareness of the risks involved in their operations, but nevertheless proceeded in conscious indifference to the rights, safety, and/or welfare of others, including the Plaintiffs. Therefore, Plaintiffs pray that punitive damages be awarded against Defendants. Plaintiffs would show that nothing Plaintiffs did, or failed to do, in any way contributed to this incident.

### **NEGLIGENT TRESPASS**

27. Plaintiffs will further show that Defendants' negligence in causing the explosion also caused a trespass to Plaintiffs' personal property.

28. The Defendants' negligence caused a significant interference or lack of possession of Plaintiffs' possessory interest in their personal property. The Defendants' negligence and ultimate trespass is depriving the Plaintiffs of the use of their property, which appears to be for a substantial period.

### **VI.** **REQUEST FOR DISCLOSURES**

29. Pursuant to Tex. R. Civ. P. 194.2, Defendants are requested to disclose within fifty days after service of this request, the information and materials described in Rule 194.2(a)-(l).

**VII.**  
**JURY DEMAND**

30. Plaintiffs hereby request that all causes of action alleged herein be tried before a jury of citizens residing in Harris County, Texas, and concurrently tender the appropriate jury fee with the filing of this petition.

**VIII.**  
**PRAYER**

31. For these reasons, Plaintiffs ask that the Defendants be cited to appear and answer and be held liable for the following:

- a. For money damages in an amount to be determined by a jury;
- b. Real property and personal property damages;
- c. Physical pain and suffering in the past and future;
- d. Mental anguish in the past and future;
- e. Medical expenses in the past and future;
- f. Loss of household services in the past and future;
- g. Exemplary and punitive damages;
- h. Prejudgment and post judgment interest;
- i. Costs of suit;
- j. Lost wages;
- k. All other relief, in law or in equity, to which the Plaintiffs may be justly entitled.



Dated: June 23, 2020

**RESPECTFULLY SUBMITTED,**

**CLARK, LOVE & HUTSON, PLLC**

/s/ Adam D. Peavy

Adam D. Peavy, of counsel

[adam@peavy-law.com](mailto:adam@peavy-law.com)

State Bar No. 24029766

Scott A. Love

[slove@triallawfirm.com](mailto:slove@triallawfirm.com)

Texas Bar No. 24002495

Ana M. Ene

State Bar No. 24076368

[aene@triallawfirm.com](mailto:aene@triallawfirm.com)

440 Louisiana Street, Suite 1700

Houston, Texas 77002

(713) 757-1400 (tel.)

(713) 759-1217 (fax)



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91045845 Total Pages: 9

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**clarklovehutson**

A Professional Limited Liability Company

Marilyn Burgess - District Clerk Harris County

Envelope No. 43978234

By: Marcella Hill

Filed: 6/23/2020 4:12 PM

June 23, 2020

Ms. Marilyn Burgess  
Harris County District Clerk  
201 Caroline St.  
Houston, TX 77002

Re: Case No. 2020-37607; Hortenisa Lima and Edward Flores v. Watson  
Grinding and Manufacturing Co., et al

Dear Ms. Burgess:

Attached to this correspondence are Requests for Issuance of Service forms for all defendants (6 total). The fees for issuance of service were previously paid as part of the original filing fees. Please E-issuance the citations to the attention of Adam Peavy at [apeavy@triallawfirm.com](mailto:apeavy@triallawfirm.com).

Should you have any questions or need further information, please do not hesitate to contact our office at 713-757-1400.

Sincerely,

Tollie Windham  
Sr. Litigation Paralegal

/tw  
Enc.



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

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Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition

FILE DATE: \_\_\_\_\_ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: KMHJ, LTDAddress of Service: 1400 McKinney Street, Ste. 1212City, State & Zip: Houston, TX 77010Agent (if applicable) KMHJ Management Company, LLC

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not by E-Issuance) ☐ Attachment (not by E-Issuance)
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus (not by E-Issuance) ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_ ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.  
Visit [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com) for more instructions.**
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain \_\_\_\_\_

Issuance of Service Requested By: Attorney/Party Name: Adam D. Peavy Bar # or ID 24029766Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002Phone Number: 713-757-1400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

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Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition

FILE DATE: \_\_\_\_\_ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: KMHJ Management Company, LLCAddress of Service: 1400 McKinney Street, Ste. 1212City, State & Zip: Houston, TX 77010Agent (if applicable) Kelly Lee Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not by E-Issuance) ☐ Attachment (not by E-Issuance)
- ☐ Certiorari ☐ Highway Commission (\$12.00)
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- ☐ Habeas Corpus (not by E-Issuance) ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_ ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.  
Visit [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com) for more instructions.**
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain \_\_\_\_\_

Issuance of Service Requested By: Attorney/Party Name: Adam D. Peavy Bar # or ID 24029766Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002Phone Number: 713-757-1400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

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Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition

FILE DATE: \_\_\_\_\_ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Matheson Tri-Gas, Inc.Address of Service: 1999 Bryan Street, Ste. 900City, State & Zip: Dallas, TX 75201Agent (if applicable) CT Corporation Service

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
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- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

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- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_ ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain \_\_\_\_\_

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Visit [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com) for more instructions.

Issuance of Service Requested By: Attorney/Party Name: Adam D. Peavy Bar # or ID 24029766Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002Phone Number: 713-757-1400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91051581 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition

FILE DATE: \_\_\_\_\_ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Grinding and Manufacturing Co.Address of Service: 4525 Gessner RoadCity, State & Zip: Houston, TX 77041Agent (if applicable) John M. Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation    ☐ Citation by Posting    ☐ Citation by Publication    ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias    Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order    ☐ Precept    ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00)    ☐ Capias (not by E-Issuance)    ☐ Attachment (not by E-Issuance)
- ☐ Certiorari    ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00)    ☐ Hague Convention (\$16.00)    ☐ Garnishment
- ☐ Habeas Corpus (not by E-Issuance)    ☐ Injunction    ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)
- Note:** The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.  
Visit [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com) for more instructions.
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain \_\_\_\_\_

Issuance of Service Requested By: Attorney/Party Name: Adam D. Peavy Bar # or ID 24029766Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002Phone Number: 713-757-1400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91051582 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**



# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition

FILE DATE: \_\_\_\_\_ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Valve Services, Inc.Address of Service: 4525 Gessner RoadCity, State & Zip: Houston, TX 77041Agent (if applicable) John M. Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not by E-Issuance) ☐ Attachment (not by E-Issuance)
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus (not by E-Issuance) ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_ ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
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- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain \_\_\_\_\_

Issuance of Service Requested By: Attorney/Party Name: Adam D. Peavy Bar # or ID 24029766Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002Phone Number: 713-757-1400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91051583 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition

FILE DATE: \_\_\_\_\_ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Western International Gas & Cylinders, Inc.Address of Service: 7173 Highway 159 EastCity, State & Zip: Bellville, Texas 77418Agent (if applicable) Denise C. Haugen

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not by E-Issuance) ☐ Attachment (not by E-Issuance)
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus (not by E-Issuance) ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_ ☒ E-Issuance by District Clerk  
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- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
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- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain \_\_\_\_\_

Issuance of Service Requested By: Attorney/Party Name: Adam D. Peavy Bar # or ID 24029766Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002Phone Number: 713-757-1400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91051584 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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